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1
    Kresta Nora Daly, SBN 199689
    BARTH DALY LLP
    PO Box F
     Winters, California 95694
 3
    Telephone: (916) 440-8600
    Facsimile: (916) 440-9610
    Email: kdaly@barth-daly.com
 4
 5
    Tasha Paris Chalfant, SBN 207055
    Attorney At Law
 6
    13620 Lincoln Way, Suite 325
    Auburn, California 95603
 7
    Telephone: 916.444.6100
    Facsimile: 916.930.6093
 8
    Email: tashachalfant@gmail.com
 9
     Attorneys for Defendant
    BRADLEY REGER
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                            IN THE UNITED STATES DISTRICT COURT
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                          FOR THE EASTERN DISTRICT OF CALIFORNIA
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15
    UNITED STATES OF AMERICA,
                                                   Case No. 2:23-CR-00177-DC
16
                  Plaintiff,
                                                   EX PARTE APPLICATION TO SEAL
                                                   STATUS MEMORANDUM PART B AND
17
           v.
                                                   [PROPOSED] ORDER
18
    BRADLEY REGER,
19
                  Defendant.
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21
           PLEASE TAKE NOTICE that defendant Bradley Reger moves the Court for leave to file
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    Status Memorandum Part B under seal. The documents will be served on counsel for the
23
    government.
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           The application is made upon the grounds that good cause exists to file the status
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    memorandum under seal. Courts have found ex parte requests permissible. U.S. v. Kravetz, 709 F.3d
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    47, 53 (1st Cir. 2013).
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This Court has the authority to file documents under seal pursuant to Federal Rule of Criminal Procedure 49.1(d). The status memorandum contains Mr. Reger's confidential medical information as well as information about where Mr. Reger is housed. This is potentially a security concern because the Marshals Service does not disclose where detainees are housed nor details about potential moves.

There is good cause for this court to use its authority under Federal Rule of Criminal Procedure 49.1(d) to file the declarations under seal.

Dated: October 27, 2025 Respectfully submitted,

By /s/ Kresta Nora Daly
KRESTA NORA DALY
TASHA PARIS CHALFANT
Attorneys for Brad Reger

ORDER

The court, having received, read and considered the defendant's *ex parte* application to seal filed on October 27, 2025, and good cause appearing therefrom, APPROVES the defendant's application. Accordingly, the defendant's status memorandum part B is sealed until further order of the court.

IT IS SO ORDERED.

Dated: November 3, 2025

Dena Coggins \United States District Judge